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7 Attorney for Ferdinand Richard Balcar, Jr.

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 FERDINAND RICHARD BALCAR, JR.,

15 Defendant.

Case No. 2:96-cr-00046-KJD-PAL

**Stipulation to Continue Supplement's
Deadline to Motion for
Compassionate Release**
(Fourth Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason Freirson, United
18 States Attorney, and Robert Ellman, Assistant United States Attorney, counsel for the United
19 States of America, and Rene L. Valladares, Federal Public Defender, and Heidi Ojeda, Assistant
20 Federal Public Defender, counsel for Ferdinand Richard Balcar, Jr., request that the due date
21 for Mr. Balcar's Supplement to Motion for Compassionate Release (ECF No. 249), be extended
22 until February 7, 2023 and the Government will have until February 21, 2023, to file a response.

23 This Stipulation is entered into for the following reasons:

- 24 1. Counsel for defense needs additional time to gather information to supplement
25 Mr. Balcar's request for compassionate release.
- 26 2. The government does not oppose this request.
3. Mr. Balcar does not object to the continuance.

1 4. The additional time requested by the stipulation is made in good faith and not
2 for purposes of delay.

3 This is the fourth request for a continuance of the supplement deadline.

4 DATED this 31st of January, 2023.

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6 RENE L. VALLADARES
7 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

8 By /s/ Heidi Ojeda
9 HEIDI OJEDA
10 Assistant Federal Public Defender

 By /s/ Robert Ellman
 ROBERT ELLMAN
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 FERDINAND RICHARD BALCAR, JR.,

7 Defendant.
8

Case No. 2:96-cr-00046-KJD-PAL

ORDER

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10 IT IS THEREFORE ORDERED that upon consideration of Defendant's Request to
11 Extend Deadline for filing his Supplement to Motion for Compassionate Release, that the
12 Defendant's deadline to file his Supplement is extended until February 7, 2023, and the
13 Government will have until February 21, 2023, to file a response.

14 DATED this 1st day of February, 2023.

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17 UNITED STATES DISTRICT JUDGE
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